

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PAUL J. McNALLY, as he is TRUSTEE,
MASSACHUSETTS LABORERS' HEALTH AND
WELFARE FUND and NEW ENGLAND LABORERS'
TRAINING TRUST FUND; JAMES MERLONI, JR.,
as he is TRUSTEE, MASSACHUSETTS LABORERS'
PENSION FUND and MASSACHUSETTS LEGAL
SERVICES FUND; MARTIN F. WALSH, as he is
TRUSTEE, MASSACHUSETTS LABORERS'
ANNUITY FUND,

Plaintiffs

vs.

LITTLETON ENVIRONMENTAL SERVICES, INC.,
Defendant

and

J.T. CALLAHAN & SONS, INC.,
Reach-and-Apply Defendant

and

FLEET BANK,
Trustee

C.A. No. 03-12461 NG

VERIFIED REQUEST TO ENTER DEFAULT

Plaintiffs Paul J. McNally, as he is Trustee, Massachusetts Laborers' Health and Welfare Fund, et al, request the Clerk to enter the default of Littleton Environmental Services, Inc. (hereinafter "Littleton"). This request is made pursuant to Rule 55(a), Fed.R.Civ.P. In support of this request, the Plaintiffs say:

- 1) This action was filed on December 8, 2003.

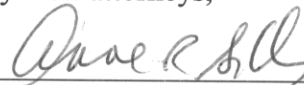
- 2) Complaint was served on defendant Littleton on April 8, 2004.
- 3) Littleton has filed neither an Answer nor a responsive pleading to the Complaint.

WHEREFORE, plaintiffs seek the entry of Default in this matter.

Respectfully submitted,

PAUL J. MCNALLY, as he is
TRUSTEE, MASSACHUSETTS
LABORERS' HEALTH AND WELFARE
FUND, et al,

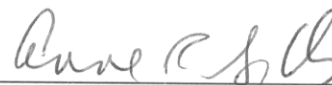
By their attorneys,



Anne R. Sills, Esquire
BBO #546576
Segal, Roitman & Coleman
11 Beacon Street
Suite #500
Boston, MA 02108
(617) 742-0208

VERIFICATION

I, Anne R. Sills, verify that I have read this Verified Request to Enter Default and that the facts set out in the Request are true to the best of my knowledge and belief.

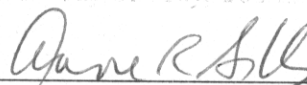


Anne R. Sills, Esquire

Dated: May 6, 2004

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above Verified Request to Enter Default has been served by certified and first class mail upon Littleton Environmental Services, Inc. at P.O. Box #397, Littleton, MA 01460 and J.T. Callahan & Sons, Inc. at 80 First Street, Bridgewater, MA 02324 this 6th day of May, 2004.



Anne R. Sills, Esquire